



Driving progress
through partnership

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November 13, 2020

Via ECF and Email

Special Master Dennis M. Cavanaugh, U.S.D.J. (Ret.)

McElroy, Deutsch, Mulvaney & Carpenter, LLP

1300 Mount Kemble Avenue

P.O. Box 2075

Morristown, NJ 07962

RE: MSP Recovery Claims Series LLC, et al. v. Sanofi Aventis U.S., LLC, et al.
Civil Action No. 18-02211 (BRM) (LHG)

Dear Judge Cavanaugh:

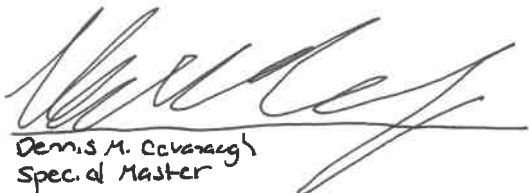
Pursuant to Your Honor's November 6, 2020 scheduling order, the parties in the above-referenced matter met on November 12, 2020, to discuss a protocol for the preservation and production of electronically stored information ("ESI") and a proposed confidentiality order. We write to update Your Honor on the status of those documents. The parties by mutual agreement plan to submit the ESI protocol and confidentiality order by Friday, November 20.

If the foregoing meets with Your Honor's approval, we respectfully ask that this letter be "So Ordered" by Your Honor.

The parties will also submit a stipulation to be bound by the deposition protocol in *In re Insulin Pricing Litigation* by the end of today.

STIPULATED AND AGREED TO:

SO ORDERED



Dennis M. Cavanaugh
Spec. d Master

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Diane A. Bettino ♦ Office Administrative Partner ♦ A Limited Liability Partnership formed in the State of Delaware

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cc: All counsel of record (via ECF and email)
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